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San Rafael City Council
1400 Fifth Ave., Rm. 209
San Rafael, CA 94901

Dear Mayor Colin and Councilmembers:

Marin Environmental Housing Collaborative (MEHC) is a consortium of advocates building support for projects and policies that advance affordable housing as well as environmental integrity and social justice. We are writing to comment on the Annual Progress Report on Housing for 2020 and lessons learned that must be applied to the Northgate Town Square project.

As usual, the staff report is well written, concise and informative. The report shows that the City has made significant and successful efforts with renter protections, relocation assistance, by-right approval for 32 extremely low-income transitional units at 190 Mill Street and the purchase of 3301 Kerner Boulevard for transitional housing.

Unfortunately, with 75% of the 6th Housing Element cycle completed, San Rafael's housing production is lagging at all income levels, as summarized below:

Income level	RHNA Allocation Built to Date
Very Low	2.9%
Low	43.2%
Moderate	6.1%
Above Moderate	54.8%
Total Units	32.0%

In the most segregated county in the Bay Area where thousands of lower income households are paying far more than they can afford for housing, these shortfalls deprive people of desperately needed shelter. Further, this lack of production may trigger SB35 with a resultant loss of local control and, possibly, one or more poorly located projects.

Some of the factors that have caused the low rate of production are beyond the City's control, including the economy in the first years of the 6th cycle and the

relative lack of “easy” sites. However, “the process” is frequently part of the problem. In too many cases applicants have been persuaded to reduce the unit count in their plans early in project review to overcome the almost automatic opposition to multi-unit developments. The City Council’s recent action to streamline the process, especially at the Design Review Board, has the potential to improve this situation.

The Northgate Town Square application is an excellent opportunity to address badly needed housing at all income levels, make progress on RHNA obligations, upgrade a deteriorating property, and realize the North San Rafael Vision. Northgate Town Square is obviously a large project; there is an almost automatic assumption that if a large project can be made smaller, potential impacts will be less. Too often the result is a loss of housing opportunity where impacts were actually non-existent or could have been mitigated. We strongly urge the City Council to state its desire to maintain the unit count in the Northgate application until the EIR is completed.

Northgate Town Square is also an opportunity to address San Rafael’s affordable housing goals. We recommend that the Council state its intent to apply the recently adopted inclusionary formula to require that 5% of the units will rent in the low-income range and the 10% will be in the moderate range. These ratios are consistent with the inclusionary formula and would provide the greatest number of affordable units. Providing direction at this early stage would facilitate the applicant’s financial planning and add some certainty to this aspect of the process.

Thank you for your consideration.

A handwritten signature in blue ink that reads "Robert J. Pendoley". The signature is written in a cursive style with a large, stylized initial "R".

Robert Pendoley
Chair
Marin Environmental Housing Collaborative